

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
Harrisonburg Division

In re: ) Chapter 13  
 )  
CYDNE ANN FARRIS, ) Case No. **21-50621**  
 )  
Debtor. )

**OBJECTION TO DEBTOR'S MOTION TO  
VOLUNTARILY DISMISS CHAPTER 13 CASE AND REQUEST FOR A HEARING**

Rebecca Barry and Bryan Barry (collectively, the “Barrys”) for their Objection to Debtor’s Motion to Voluntarily Dismiss Chapter 13 Case and Request for a Hearing (the “Objection”), states as follows:

**Procedural Background**

1. Cydne Ann Farris (the “Debtor”) filed a voluntary *pro se* petition under Chapter 13 of Title 11, United States Code (the “Bankruptcy Code”) on December 22, 2021, in the United States Bankruptcy Court for the Western District of Virginia (the “Court”), commencing the above-captioned case (the “Case”).

2. After commencing the Case in bad faith and proposing a Chapter 13 plan in bad faith, the Debtor now seeks to remove herself from the jurisdiction of this Court the filing of a Motion to Voluntarily Dismiss (the “Motion to Dismiss”).

3. The right of the Debtor to obtain the grant of dismissal of the Case is not absolute and is subject to objection and limitations on the commencement of a new case in the future.

WHEREFORE, the Barrys object to the dismissal of the Case without a hearing on the Motion to Dismiss and request an opportunity to be heard on the dismissal of the Case and the imposition of a bar to the Debtor’s commencement of a case in the future.

REBECCA BARRY & BRYAN BARRY

By: /s/ William E. Callahan, Jr.  
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2022, I filed the above Objection to Debtor's Motion to Voluntarily Dismiss Chapter 13 Case using the Court's CM/ECF filing system, thereby causing a copy hereof to be served upon counsel for the Debtor, the Chapter 13 Trustee and all parties requesting electronic notice in this Case.

/s/ William E. Callahan, Jr.